

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA

v.

JASON COLLYMORE,
Defendant.

1:21CR73WES-LDA

Cr. No. _____

In violation of 18 U.S.C. § 115(a)(1)(B)

INDICTMENT

The Grand Jury charges that:

COUNT ONE

At all times relevant to this Indictment:

1. Defendant JASON COLLYMORE was on Federal Supervised Release after having been released from the custody of the Bureau of Prisons in July 2020. As part of his Supervised Release, COLLYMORE participated in the Helping Offenders Prepare for Re-entry ("HOPE") Court program.

2. D.D., a United States Probation Officer, was an employee of the United States and was authorized by law to engage in and supervise the prevention, detection, investigation, and prosecution of any violation of Federal criminal law.

3. Officer D.D. supervised COLLYMORE during COLLYMORE's term of Supervised Release. As COLLYMORE's supervising probation officer, Officer D.D.'s duties included, among others: (a) ensuring that COLLYMORE complied with his conditions of release; (b) monitoring COLLYMORE's activities and meeting with COLLYMORE at his home; (c) directing COLLYMORE to services, such as substance

abuse and mental health treatment; and, (d) managing any risk COLLYMORE posed to individuals and the community by verifying his employment, monitoring his associates, and restricting his travel, among other actions.

4. On or about June 16, 2021, Officer D.D. contacted COLLYMORE regarding his Moral Reconciliation Therapy (MRT) sessions, which COLLYMORE was required to participate in as a condition of the HOPE Court Program. Officer D.D., having learned that COLLYMORE had not completed a requirement of his MRT, discussed the importance of the requirement with COLLYMORE. COLLYMORE acted upset that his failure to complete the MRT requirement interfered with his progression through the HOPE Court program.

5. On or about June 21, 2021, Officer D.D. and another officer met with COLLYMORE to discuss his upcoming MRT session. COLLYMORE acted upset; he refused to meet with Officer D.D. for more than a few minutes; he was dismissive of Officer D.D.'s questions; and he ended the meeting by walking away and asking, "are we done?" Officer D.D. requested that COLLYMORE call him on June 23, 2021, after COLLYMORE's June 22, 2021 MRT session.

6. On or about June 22, 2021, COLLYMORE failed to attend his MRT session, as required by the HOPE Program.

7. On or about June 23, 2021, COLLYMORE called Officer D.D. multiple times, yelling and swearing at Officer D.D., and calling Officer D.D. offensive names. Officer D.D. terminated the call. COLLYMORE repeatedly called Officer D.D. and told Officer D.D. that he was recording the telephone call on Facebook Live and Instagram

for everyone to see how Officer D.D. was a "piece of shit" and a "fucking asshole," conduct which was designed to intimidate Officer D.D. and impede Officer D.D. from performing his official duties.

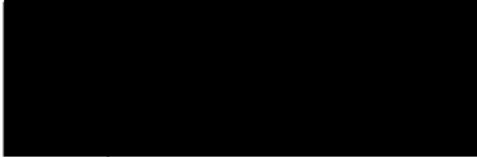
8. On or about June 24, 2021, COLLYMORE failed to attend his HOPE Court proceeding as required.

9. On or about June 25, 2021, Officer D.D. contacted COLLYMORE to discuss COLLYMORE's residence and current situation. COLLYMORE displayed anger, and threatened Officer D.D. COLLYMORE stated, among other threats, words to the effect of the following: (1) that COLLYMORE would call a meeting at the Courthouse on Monday and bring the "whole gang" to make his grievances known; (2) "You're done [Officer D.D.];" (3) "I'm going to wash you up and put you through the washer, mother fucker. I promise you that;" (4) "It's a whole gang coming at you, don't worry about it. You're done [Officer D.D.], I'm going to wash you up, I promise you. You know when someone tells you something and then it happens and then you're sitting there like how the fuck did he do that?" (5) "I am going to wash your punk ass the fuck up, mother fucker;" (6) "Tell your wife, we have to fucking remortgage the house, I'm going to buy your house and kick you out;" and, (7) "I'll see you on Monday, pussy."

10. Between on or about June 16, 2021 and June 25, 2021, in the District of Rhode Island, Defendant JASON COLLYMORE did threaten to assault Officer D.D., a United States Probation Officer, with intent to impede, intimidate, and interfere with Officer D.D. while he was engaged in his duties, and with intent to retaliate against

Officer D.D. on account of performance of his official duties, in violation of 18 U.S.C. § 115(a)(1)(B).

A TRUE BILL:



Grand Jury Foreperson

Handwritten signature of Sandra R. Hebert in cursive script.

SANDRA R. HEBERT
Assistant U.S. Attorney
Criminal Division Chief

Handwritten signature of Richard B. Myrus in cursive script.

RICHARD B. MYRUS
Acting United States Attorney

Date: July 16, 2016